



OFFICE OF THE DISTRICT ATTORNEY
RICHMOND COUNTY
MICHAEL E. McMAHON
DISTRICT ATTORNEY

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[DATE]

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With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosures:

A review of the officer's Raymond Russo Central Personnel Index (CPI) revealed the following:

1. On April 3, 2018 Officer Russo had a substantiated departmental investigation for invoice discrepancy-lab and incomplete/inaccurate-property clerk invoice for which he received a schedule "A" command discipline.
2. On November 11, 2018 Officer Russo had a partially substantiated departmental investigation for an incomplete report.

A review of the officer's CCRB history revealed the following:

1. On April 2, 2018 Officer Russo had a substantiated CCRB complaint after he issued a retaliatory summons and improperly searched a vehicle, for which he received a schedule "A" command discipline.

The People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.